

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (IDNR) finds that:

1. Unverferth Manufacturing Company, Inc., located at 27612 Temple Ave., Shell Rock, IA 50670 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Mr. Michael Van Mill.
2. Unverferth Manufacturing Company, Inc. is a farm machinery and equipment manufacturer. This facility consists of 19 emission points and 19 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	31.17
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Sulfur Dioxide	SO ₂	1.03
Nitrogen Oxides	NO _x	16.10
Volatile Organic Compounds	VOC	225.57 ⁽²⁾
Carbon Monoxide	CO	2.18
Hazardous Air Pollutants ⁽¹⁾	HAP	6.57

⁽¹⁾ May include the following: cumene, ethylbenzene, hexamethylene-1-6-diisocyanate, manganese compounds, toluene and xylene.

⁽²⁾ .57 tons per year of VOCs is from propane gas combustion, which is not included in the 225-tpy limit.

3. Unverferth Manufacturing Company, Inc. submitted a Title V Operating Permit renewal application on June 19, 2018 and additional information on August 1, 2018. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

IDNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the proposed permit will run from February 21 through March 23, 2019. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period. During this time, anyone may submit written comments on the permit. Mail signed comments to John Woodland at the IDNR address shown below.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. IDNR will hold a public hearing upon finding, based on requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to John Woodland at the IDNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-31, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-31.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Review Notes

Facility: Unverferth Manufacturing Company, Inc.

EIQ#: 92-5194

Facility #: 12-04-005

Reviewer: John Woodland

Unverferth Manufacturing Company, Inc. has applied for a Title V Permit renewal. The application was submitted on June 19, 2018. The facility manufactures grain wagons, sprayers, and tillage machinery at their Shell Rock facility and has 19 emission points and 19 emission units.

Sources of emissions are exhaust from painting operations including paint booths, paint drying ovens, and paint mixing and storage rooms, welding operations, washing operations, and caulking.

The Responsible Official for the facility is Mr. Michael Van Mill, the Operations Manager. The facility contact is Mr. Greg Steinecker, Environmental and Safety Specialist.

Potential Emissions

Potential emissions were checked and corrected, where necessary. The facility has nine emission units with construction permits. Ten emission units do not have construction permits. The facility requested throughput limits that set the potential emission limits of the most significant contaminants. VOCs are the only major emissions (>100 tpy) at this facility and their emission potentials are based on permit limits and natural gas combustion.

Title V Applicability

Pollutant	Major for Title V?
PM ₁₀	[FORMC HECKBOX]
SO ₂	[FORMC HECKBOX]
NO _x	[FORMC HECKBOX]
VOC	[FORMC HECKBOX]
CO	[FORMC HECKBOX]

	CKBOX]
Lead	[FORMCHE CKBOX]
Individual HAP	[FORMCHE CKBOX]
Total HAPs	[FORMCHE CKBOX]

Emission Sources

- **Paint Booths (EU-3A, C and D, EU-4A, B, C and D, EU 32A, C and D):** The facility has three wet paint booths (#3, #4, and #5). Paint booth #3 has two stacks. The booths have dry filters for control and construction permits with PM and PM₁₀ limits. The current permit sets a capacity of 41.2 gallons per hour in each paint booth and a facility-wide VOC limit of 225 tons/year for emissions from everything except powder coating and combustion. The paint booths are subject to 40 CFR 63 Subpart M. The facility achieves compliance with compliant materials (no more than 2.6 pounds of organic HAP per gallon of coatings solids), but this is only specified for the newest booth (EU-32). The Title V Permit requires our standard Spray Booth Filter Agency O&M Plan. The cure oven for booth 4 was included with the booth since it is inside booth 4.
- **Permitted Cure Ovens (EU-C1 and EU-C2):** These are a powder-coat cure oven and paint line #3 cure oven. Both have construction permits with hourly PM and PM₁₀ limits as well as the default opacity, PM and SO₂ emission limits. They are subject to 40 CFR 63 Subpart M, and compliance is shown with compliant materials in the paint booths.
- **Four Stage Washer System (EU-W3, EU-W3C and EU-W3D):** The washing of materials prior to painting is subject to Subpart M, so the wash system is included in the permit. The system has two propane heaters that emit through separate stacks. They would be subject to the Boiler MACT (Subpart DDDDD) if they were not part of the washer, which makes them subject to M.
- **GMAW of Carbon Steel, Caulking and Clear Booth Coating (EU-5, EU-8 and EU-9):** These are internally vented sources. The clear booth coating operation is not subject to Subpart M, because it does not involve facility-manufactured products. Emissions from the caulking and clear coat booth coating are included with the facility-wide VOC limit and there is no longer a need to place limits on the caulk or clear coat usage.
- **Paint Kitchen (EU-20):** This paint storage room is no longer used, according to the facility, but it still has a construction permit (01-A-163-S1) and is subject to Subpart M, so it is included in the permit.
- **Manual Wash Bay 1 (EU-21):** This washer cleans parts prior to painting. It is subject to Subpart M. Construction permits set PM and PM₁₀ limits as well as setting a no visible emissions indicator opacity and citing the 225-ton VOC facility-wide limit.
- **Dry-off Oven (EU-D1):** This propane-fired 2.4 MMBtu/hr oven is used to dry-off equipment after it is washed. It has a construction permit with a no visible emissions indicator opacity limit, PM and PM₁₀ emission limits, default SO₂ and 0.1 gr/dscf PM limits. The oven is subject to Subpart M.

- **Wash Bay (EU-27):** This wash bay is subject to Subpart MMMM.
- **Dry-off Oven (EU-28):** This is a dry-off oven subject to Subpart MMMM. It has the default opacity, SO₂, and PM emission limits.
- **Paint Booth #5 Cure Oven (EU-32B):** This curing oven vents through a different stack than paint booth 5, so it is not listed with the booth, but as a separate unit. It is subject to Subpart MMMM.
- **Paint Kitchen (EU-38):** This is a paint and solvent storage room that is subject to Subpart MMMM

Program Applicability

CAM: Not required, because uncontrolled PM and PM₁₀ emissions from all controlled units are less than 100 tons per year.

Acid Rain: The source is not subject.

PSD: This facility is not a major source of criteria air pollutants.

Stratospheric Ozone: Not subject.

112(r): Not subject.

NSPS: Not subject.

NESHAP: The Paint Booths, washers, drying and cure ovens and paint kitchens are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart MMMM – Surface Coating of Miscellaneous Metal Parts and Products (40 CFR §63.3880 through 40 CFR §63.3981) and to NESHAP Subpart A - General Provisions (40 CFR §63.1 through 40 CFR §63.15). The facility is showing compliance by using compliant materials. The ovens, washers and paint kitchens have no applicable requirements from Subpart MMMM.

Changes to the Title V Permit

Several insignificant emission units were added to the Insignificant Equipment List (EU-39, EU-40, and EU-41). The tanks size was increased for EU-T1 and EU-T2. The Emission Point Characteristics wording was updated. There are no other changes to the permit.